

CDBG-Plus Working Group – Consolidated Plan Suggestions

ConPlan Component	Suggestion to DEFINE	Suggestion to REDEFINE	Suggestion to ELIMINATE	Cross-reference To other plans
I. Citizen Participation and Consultation		Communities update as needed.		
1.1 Consultation with other public and private agencies	This is critical. Jurisdictions need to do a better job of consulting with agencies in drafting their ConPlans.	The requirement to notify adjacent governments regarding the non-housing needs should be changed to require this only when there are problems and solutions which cross city limits lines. The wording in paragraph (4) is all that is needed. Not all PHA's have a Comprehensive Grant program; the regulation now allows the jurisdiction to ignore the PHA unless it has a Comprehensive Grant program.	Eliminate requirement to consult with surrounding jurisdictions on Community Development (non-housing) Plan. The requirement to send the state and county a copy of the non-housing community development plan should be eliminated. In practice, all they do is go in a file or the dumpster. This is a waste of postage and paper.	
1.2 Citizen Participation Plan	Public participation is absolutely critical and should not be shortened or streamlined. Jurisdictions must to do a better job of obtaining public participation and revising their ConPlans based upon public input. All too often, jurisdictions attach public comments without actually giving the comments any thought or revising the ConPlan based upon comments. This does not constitute public participation. This is a sham.	Public participation in the ConPlan is currently not meaningful. It must be made meaningful. Innovative approaches must be used and jurisdictions must actually consider public comment, as opposed to simply attaching comments to the back of the ConPlan. Regulations should state input from the public is advisory in nature and the city has final discretion on its use of entitlement funds. Citizen Participation regulations require jurisdictions to provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments and the performance report (24 CFR 91.105(a)(2)). For smaller municipalities where the use of entitlement fund may comprise a localities' entire community and		

		<p>housing development budget, input from the public becomes a type of budgetary formulation process. However, where the use of Consolidated Plan entitlement funds are subservient, but an integral part of its capital and expense budgets the regulations may mislead the public into believing they have the ability to ignore/violate/circumvent the jurisdiction's charter-mandated budgetary and capital planning procedures. HUD should permit jurisdictions flexibility within the regulation dependent upon the size and complexity of their expense and capital plan budgets.</p> <p>The City has a timing problem with the citizen participation (CP) process and the municipal budget approval process. Reducing the CP time would help with the budget timing issue.</p>		
--	--	--	--	--

II. Housing and Homeless Needs Assessment		<p>Separate section for Housing vs. Homeless Needs Assessment</p> <p>We generally use our own data gathered locally in conjunction with local service providers which is more meaningful to the community. We do this with full approval of our Area Office.</p>		
2.1 General Housing Needs	<p>Specific to each category of the ConPlan component.</p> <p>A ConPlan should allocate resources based upon its needs assessments. Many jurisdictions acknowledge the need for low and very low-income housing in the Needs Assessment, yet they fail to allocate resources to fund such housing. Jurisdictions should allocate resources based upon their needs assessment. Spending should reflect needs.</p>	<p>Separate ConPlan component for "Non Housing Needs."</p> <p>The data used for the needs assessment must be relevant and current, and all known data must be considered. Spending must reflect needs.</p> <p>Ease the requirement and provide guidance on the regulation, which "forces" localities to use data supplied by HUD. Requirement should be refined to emphasize localities are not restricted to using only tabulated Census data but are permitted to use alternate, but reliable data sources such as the locality's Housing Vacancy Survey (HVS) or the American Housing Survey (AHS).</p>		
2.2 Categories of persons affected	<p>Specific to each category of the ConPlan component.</p>	<p>The income categories are an unnecessary breakdown. It would make more sense to break them at 50% and 80% of median.</p>		

2.3 Homeless needs	Move to Homeless Needs Assessment category	Should be part of the Homeless Needs Assessment	Requiring a city to describe the nature and extent of rural homelessness is illogical.	
2.4 Other special needs		Should be part of Homeless Needs Assessment	Eliminate the need to describe facilities for persons with mental/developmental disabilities. If HUD is not providing funding for this population, the reporting requirements should not be as extensive as they are for other HUD-funded special needs populations (elderly, physical disabilities, persons with AIDS).	
2.5 Lead-based paint hazards		Move to Housing Market Analysis.		
III. Housing Market Analysis		Separate component for Homeless vs. Housing		
3.1 General characteristics				
3.2 Homeless facilities		Part of the Homeless Market Analysis Why does the reg. assume that the PHA needs to improve management and operation and the living environment?		
3.3 Special need facilities and services		Should be part of the Homeless Market Analysis.	Eliminate the need to describe facilities for persons with mental/developmental disabilities. If HUD is not providing funding for this population, the reporting requirements should not be as extensive as they are for other HUD-funded special needs populations (elderly, physical disabilities, persons with AIDS).	
3.4 Barriers to affordable housing		Part of the Homeless Market Analysis. Re-word the requirement to: "The plan must <i>describe</i> whether <i>or not</i> the cost of housing or the incentives to develop, maintain, or improve		

		affordable housing are affected by....". Regulation in present form self-incriminating. Use of word "explain" infers guilty or the need to defend a position, specifically the jurisdiction's policies do not further the creation of affordable housing.		
IV. Strategic Plan				Referencing other plans would be helpful and well received in the community .
4.1 General		<p>Look at increasing from 5 years to 10 years.</p> <p>We petition <i>against</i> shortening the time frame between strategic plans to less than five years. Shortening the timeframe would result in an increase in the expenditure of time, effort and resources without any quantifiable increase to furthering affordable housing. Hypothetically, it would create an inconsistency within the HOME program which has five years to expend the monies, thereby creating the possibility that existing programs would not meet the goals and objectives statement in the most recent (three-year) Strategic Plan.</p>		

4.2 Affordable housing		Paragraph (3) requires the jurisdiction to specify the number of families to whom affordable housing will be provided. It should be re-worded to indicate this is a goal, not a promise.		
4.3 Homeless		<p>Include special needs with this section.</p> <p>Refine Homeless Priority Table Need Levels (High, Medium, Low). Confusing since if all needs are to receive funds, in whatever amount, they are all to be considered a "High" priority. Does not describe where the jurisdiction's emphasis is placed.</p>		
4.4 Nonhousing community development		This should be the final category. Keep all housing related narratives together.	Delete the requirement for dollar amounts needed to meet the priority needs. The numbers have little basis in fact and are so large that they are meaningless. In fact, they make the problems appear so great that most citizens would just throw up their hands and give up.	
4.5 Barriers to affordable housing		<p>Incorporate Impediments to Fair Housing into ConPlan.</p> <p>Re-word the requirement to: <i>Describe</i> how policies, land use controls, zoning ordinances, etc., <i>promote or provide incentives</i> for the development of affordable housing and <i>positively</i> affect the return on investment. Regulation in present form self-incriminating (see above).</p>		

		Why is it assumed that the jurisdiction has public policies that serve as barriers? After 7 years with this requirement, isn't it possible that some of us have resolved this problem?		
4.6 Lead-based paint hazards		Subpart to Section 4.2.	This seems redundant with the lead paint rules.	
4.7 Anti-poverty strategy	This should not be eliminated. It is very important.	Subpart to Section 4.2.	Eliminate Delete this requirement. The ConPlan grants are not anti-poverty grants.	
4.8 Institutional structure		Reference in ConPlan. Modify only if major changes occur. Describe once in Five-year strategic plan with updates in One-Year Action Plan to specific Departments/Divisions that have undergone reorganization.	Delete this. It is merely an exercise in writing to meet this requirement. Anything of value in this area should be addressed throughout the plan, as various goals, objectives, and projects are described. It should apply only if the PHA is "troubled". Eliminate.	Reference Five-year Con-Plan for those city Departments whose institution structure has remained unchanged since the release of the original report.
4.9 Coordination		Should be part of citizen plan.	Delete this. What purpose does it serve? Eliminate	
4.10 Low-income housing tax credit use		Subpart of Section 4.2		
4.11 Public housing resident initiatives		Subpart of Section 4.2	Delete this. It should be part of the PHA's plan.	Reference PHA Annual Plan: Section 12, PHA Community Service and Self-Sufficiency Programs.
V. Annual Action Plan				Referencing other plans would be helpful and well received in the community.
5.1 Form application				
5.2 Resources		Combine as one category.		

5.3 Other resources			Eliminate.	
5.4 Activities / Method of Distribution				
5.5 Geographic distribution		<p>Eliminate. Too confusing esp. when eligible elimination of a blighting condition occurs in a non-CD eligible tract.</p> <p>Mapped in 20/20</p>	Eliminate.	
5.6 Homeless and other special needs		Reference in ConPlan.	<p>Delete this. It is redundant, since all this information necessary must be included in the description of activities to be undertaken.</p> <p>Eliminate.</p>	
5.7 Other actions		<p>Reference in ConPlan. Modify only when major changes occur.</p> <p>Modify excessive narrative requirements such as barriers to affordable housing, and anti-poverty strategy. Change word "explain" to "describe" Many of the regulations are currently worded in such a manner, which in essence, HUD expects the jurisdictions to incriminate themselves.</p>	<p>Anything, which might be deleted from the requirements for the Strategic Plan, should also be deleted here.</p> <p>Eliminate.</p>	<p>Cross-reference: 1) Coordination and activities within the Empowerment Zone with the EZ semi-annual report submitted to HUD instead of providing a narrative within the Gov't Coordination section; and 2) cross-reference any City report which describes to HUD the activities within the Homeownership Zone on a regular basis.</p>
5.8 Program-specific requirements		This is partly repetitive with the Activities to be undertaken. Can they be combined into one section?		

VI. Certifications				
6.1 Affirmatively furthering fair housing	There is a problem with the ConPlan AFFH certification in my jurisdiction (Long Beach), which I assume is also a problem elsewhere. Our city council approves our ConPlan, yet it does not approve (or likely ever see) the AI. A local city commission approves the AI instead. The AFFH certification in the ConPlan, therefore, is a sham because the Council has never seen the AI. Accordingly, how can the Council certify that the city is AFFH (especially in light of the fact that there is a pending complaint at HUD re: the City's 2001 AI)?	One Certification document. Annually provide a statement that the community is adhering to the Certification in the 5 Year Con. Plan. AFFH obligations must be better incorporated into the ConPlan. HUD must assure compliance by jurisdictions with the Fair Housing Planning Guide. Jurisdictions must consider the needs of Limited English Proficiency Persons in drafting the ConPlan and obtaining public input on the ConPlan.		
6.2 Anti-displacement and relocation plan		One Certification document. Annually provide a statement that the community is adhering to the Certification in the 5 Year Con. Plan.		
6.3 Drug-free workplace		See above statement.		
6.4 Anti-lobbying		See above statement.		
6.5 Authority of State		See above statement.		
6.6 Consistency with Plan		See above statement.		
6.7 Acquisition and relocation		See above statement.		
6.8 Section 3				
VII. Monitoring			Delete this. Explanation of monitoring procedures has nothing to do with planning. If this needs to be done, it should be a separate document, like the Analysis of Impediments.	

7.1 Describe standards and procedures	HUD must do a better job of enforcing the ConPlan regulations and holding jurisdictions accountable for the commitments they make in their ConPlans. HUD is not adequately monitoring the ConPlan process and it does not reply to complaints in a timely manner. This sends a message to jurisdictions that they do not need to comply with the regulations or with the commitments they make in their ConPlans. HUD must do a better job of holding jurisdictions accountable and enforcing the regulations.			
7.2 Ensure long-term compliance	The ConPlan is a planning document, not just a funding application. Jurisdictions need to recognize this and act accordingly in drafting their ConPlans.			
7.3 Meet program requirements	ConPlans should be done at least every 5 years, with annual Action Plan reporting, as is currently required.			
VIII. Other:	<p>For a small grantee, the ConPlan is nothing more than a writing exercise to justify what we already know. It serves no useful purpose for us. Much of it is redundant or not applicable, although we have to write it as if all of its requirements apply to us. It does not reveal needs we are unaware of, and it does not change or determine our priorities.</p> <p>Keep working to improve</p>	<p>CAPER: Amend the submission deadline. Two possible options include either extend the submission deadline to 105 days from 90 days (15 additional days) or create a 15-day submission "grace period".</p> <p>CAPER: Amend the submission deadline by increasing to 105 days.</p>		<p>Cross-referencing should not be done unless there is ample excerpts from the document that is being cross-referenced to give the reader sufficient information to understand what is being referenced. Otherwise, the ConPlan will be filled with many cross-references and it will not contain any</p>

	the data entry software!			substantive information that can be reviewed by the public and by HUD. It does not matter if the documents being cross-referenced are available for review on line or elsewhere. When someone is reviewing a ConPlan, he or she must have enough substantive info in the ConPlan itself to be able to understand it and comment on it. Cross-referencing will make it very difficult for both HUD and the public to review the ConPlan.
--	--------------------------	--	--	---

CDBG-Plus Working Group – Consolidated Plan Suggestions for Technical Assistance and Training

Subject	TA/Training for Grantees	TA/Training for HUD Staff	TA/Training for Both
Homeless and Housing Needs Assessment, 2.1 General Housing Needs	Provide guidance and training to localities that they are not restricted to using only Census data supplied by HUD but are permitted to use alternate, but reliable data sources such as the locality's Housing Vacancy Survey (HVS) or the American Housing Survey (AHS).		
IDIS	Different levels of training be provided to communities based on skill level	All HUD staff should be trained on IDIS	
CDBG	Advanced training for CDBG personnel based on years of service.		
Federal Regulations	Provide an annual update on regulations governing programs.		
Program Meeting	Meet with Communities once a year for round table discussions on programs	HUD staff should be included in annual meeting.	